

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

1789 FOUNDATION INC., d/b/a CITIZEN
AG, and ANTHONY GOLEMBIEWSKI,

Plaintiffs,

v.

AL SCHMIDT, in his official capacity as
Secretary of State,
and COMMONWEALTH OF
PENNSYLVANIA,

Defendants.

Case No. 3:24-cv-01865-RDM

(Honorable Robert D. Mariani)

MOTON TO WITHDRAW AS COUNSEL OF RECORD

Gregory A. Stapp, Esquire of Stapp Law, LLC, counsel of record for Plaintiffs 1789 Foundation, Inc. d/b/a Citizen AG and Anthony Golembiewski, respectfully requests permission to withdraw as counsel in the above-captioned matter because the Plaintiffs have retained Ronald David Coleman, Esquire to represent them in this matter. Mr. Coleman's pro hac vice was granted on April 9, 2025.

Mr. Coleman was selected by the Plaintiffs to continue their representation in this matter. Thus, the Plaintiff clients are aware of the pendency of this motion, as it has been made at their request, and they will receive service of this motion upon its filing through their new counsel. Mr. Coleman retains all case-related materials, and the client's decision to retain him ensures continued representation, this withdrawal will not cause any delay or prejudice to the procedures.

For these reasons, Gregory A. Stapp, Esquire respectfully requests this Honorable Court grant this motion, allowing him to withdrawal as counsel of record and formally recognize Ronald David Coleman, Esquire as attorney of record for the Plaintiffs.

Dated: May 23, 2025

Respectfully submitted,
1789 FOUNDATION, INC. d/b/a
CITIZEN AG and ANTHONY GOLEMBIEWSKI

By: /s/ Gregory A. Stapp
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CERTIFICATE OF GREGORY A. STAPP, ESQUIRE

I hereby certify that beginning April 1, 2025, the Plaintiffs chose to retain Ronald David Coleman, Esquire, to represent them. Whereas Attorney Stapp's services are no longer needed. The Plaintiffs remain apprised of the status of the case through Attorney Coleman and will be notified of the pendency of this motion upon service of this motion to the parties.

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CERTIFICATE OF SERVICE

I hereby certify that this 23rd day of May, 2025, a true and complete copy of the forgoing Motion to Withdraw as Counsel was served upon the all interested parties registered to receive electronic filings via the Courts ECF system.

By: /s/ Gregory A. Stapp
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